

**U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
Robin Sutton

Debtor.

Case No.: 18-12762  
Chapter 13

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**NOTICE OF MOTION**

Sirs:

Please Take Notice that upon the annexed application of Robin Sutton, debtor herein, the undersigned will move before Honorable Jean K FitzSimon Bankruptcy Judge, at United States Bankruptcy Court, Eastern District of Pennsylvania, 900 Market Street, Philadelphia, Pennsylvania as soon as counsel may be heard, for an order pursuant to Bankruptcy Rule 1007(c) extending the time of the debtor herein to file the Chapter 13 Plan and Schedules to June 6, 2018, and for such other relief as is just.

Dated: May 29, 2018

/s/ George R Tadross

George R Tadross, Esquire  
128 Chestnut Street, Suite 204  
Philadelphia, PA 19106  
215-500-5000 (phone)  
267-885-2377 (fax)  
Attorney for Debtor

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**MOTION FOR EXTENSION OF TIME**

To the Honorable Jean K FitzSimon, Bankruptcy Judge:

The application of Robin Sutton, by George R Tadross, Esquire, applicant's attorney, respectfully represents:

- (1) A voluntary petition pursuant to section 301 of Title 11, United States Code, was filed herein on April 25, 2018.
- (2) That the automatic fifteen day extension of time to file the plan as provided for in Bankruptcy Rule 1007(c) expires on May 23, 2018.
- (4) That applicant is unable to prepare and file schedules and plan within the time fixed in said order and requires additional time to do so for the following reasons:

(5) The applicant and his attorney are still in the process of gathering all of the required information because of the complex nature of this particular case.

Wherefore, the applicant move for the annexed order extending the time for filing schedules, statement of financial affairs, and plan herein until May 23, 2018, for which relief no previous application has been made.

Dated: May 29, 2018

/s/ George R Tadross

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**ORDER**

The debtor having moved for an extension of time to file the schedules, statement of affairs and plan as required by Bankruptcy Rule 1007(b),

Now, upon the application of the debtor dated May 29, 2018, and cause having been shown therefore,

It is hereby ordered that the time of the debtor herein to file the schedules, and plan required by Bankruptcy Rule 1007(b) is extended for an additional 15 days until June 6, 2018.

DATED:

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UNITED STATES BANKRUPTCY JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: Frederick Riegel at [ecfmail@fredreiglechl3.com](mailto:ecfmail@fredreiglechl3.com), and United States Trustee at [USTPRegion03.HA.ECF@usdoj.gov](mailto:USTPRegion03.HA.ECF@usdoj.gov).

DATED: May 29, 2018

/s/ George R Tadross

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Philadelphia, PA 19106  
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Attorney for Debtor